

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF MISSOURI**

RHONDA BURNETT, JEROD BREIT,)	
JEREMY KEEL, HOLLEE ELLIS,)	
and FRANCES HARVEY, on behalf of themselves)	
and all others similarly situated,)	
)	
Plaintiffs)	
)	
v.)	Case No. 19-cv-00332-SRB
)	
THE NATIONAL ASSOCIATION OF)	
REALTORS, REALOGY HOLDINGS CORP.)	
(n/k/a ANYWHERE REAL ESTATE, INC.),)	
HOME SERVICES OF AMERICA, INC., BHH)	
AFFILIATES, LLC, HSF AFFILIATES, LLC,)	
RE/MAX LLC, and KELLER WILLIAMS)	
REALTY, INC.)	
)	
Defendants.)	

**NOTICE OF PENDING SETTLEMENT AND JOINT MOTION
TO STAY CASE AS TO THE HOMESERVICES DEFENDANTS**

Plaintiffs Rhonda Burnett, Jerod Breit, Jeremy Keel, Hollee Ellis, and Frances Harvey (collective, “Plaintiffs”) and Defendants HomeServices of America, Inc., BHH Affiliates, and HSF Affiliates, LLC (collectively, “HomeServices”) hereby respectfully notify the Court that Plaintiffs have executed a binding term sheet with HomeServices to settle all claims asserted against HomeServices in this action as part of a proposed nationwide class settlement.¹ The settlement is subject to the Court’s approval under Federal Rule of Civil Procedure 23. Consistent with the Parties’ agreement, the Parties will cooperate to promptly execute a long form settlement agreement and then Plaintiffs will file a motion in this Court for preliminary approval of the proposed settlement.

¹ The settlement does not include and does not release Berkshire Hathaway Energy Company or any other corporate parent of HomeServices of America, Inc.

As provided by the settlement agreement, Plaintiffs and HomeServices hereby jointly request that the Court stay all deadlines and proceedings as to HomeServices, including the parties' pending post-trial motions and any entry of judgment, to preserve the resources of Plaintiffs, HomeServices and the Court. The stay would not preclude Plaintiffs from seeking preliminary and final approval of the settlement.

Dated: April 26, 2024

BOULWARE LAW LLC

/s/ Brandon J.B. Boulware

Brandon J.B. Boulware	MO # 54150
Jeremy M. Suhr	MO # 60075
Erin D. Lawrence	MO # 63021
1600 Genessee, Suite 416	
Kansas City, MO 64102	
Tele: (816) 492-2826	
Fax: (816) 492-2826	
brandon@boulware-law.com	
jeremy@boulware-law.com	

KETCHMARK & McCREIGHT

Michael S. Ketchmark	MO # 41018
Scott A. McCreight	MO # 44002
Ben H. Fadler	MO # 56588
11161 Overbrook Road, Suite 210	
Leawood, KS 66211	
Tele: (913) 266-4500	
Fax: (913) 317-5030	
mike@ketchmclaw.com	
smccreight@ketchmclaw.com	

WILLIAMS DIRKS DAMERON LLC

Matthew L. Dameron	MO # 52093
Eric L. Dirks	MO # 54921
1100 Main Street, Suite 2600	
Kansas City, MO 64105	
Tele: (816) 945-7110	
Fax: (816) 945-7118	
matt@williamsdirks.com	
dirks@williamsdirks.com	

Attorneys for Plaintiffs

Respectfully submitted by:

MACGILL PC

/s/ Robert D. MacGill

Matthew T. Ciulla, <i>pro hac vice</i>
Robert D. MacGill, <i>pro hac vice</i>
Scott E. Murray, <i>pro hac vice</i>
55 Monument Circle, Ste. 100c
Indianapolis, IN 46204
Tele: (317) 721-1253
matthew.ciulla@macgilllaw.com
robert.macgill@macgilllaw.com
scott.murray@macgilllaw.com

FOLEY & LARDNER LLP

Jennifer M. Keas, <i>pro hac vice</i>
Jay N. Varon, <i>pro hac vice</i>
3000 K Street NW, Ste. 600
Washington, DC 20007-5109
Tele: (202) 672-5436
jkeas@foley.com
jvaron@foley.com

LATHROP GPM LLP

Brian C. Fries	MO # 40830
2345 Grand Avenue, Ste. 2200	
Kansas City, MO 64108-2618	
Tele: (816) 292-2000	
bfries@lathropgpm.com	

*Counsel for HomeServices of America, Inc.,
BHH Affiliates, LLC, HSF Affiliates, LLC*

CERTIFICATE OF SERVICE

I hereby certify that on this 26th day of April, 2024, the foregoing was filed on the Court's electronic system, which will send notification of the same to all counsel of record.

/s/ Brandon J.B. Boulware _____

Attorney for Plaintiffs